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Attorneys for the State of Washington

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

IN RE: TFT-LCD (FLAT PANEL)
ANTITRUST LITIGATION,

This Document Relates to all Cases

NO. M-07-1827-SI

MDL No. 1827

Date: February 5, 2010
Time: 9:00 AM
Court: Hon. Susan Illston

**NOTICE OF MOTION AND MOTION BY THE STATE OF WASHINGTON
TO INTERVENE UNDER FED. R. CIV. P. 24(b)(2)**

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE THAT the Washington State Attorney General files this motion, to be heard on February 5, 2010 at 9:00 a.m., before the Court of the Honorable Judge Susan Illston, United States District Court Judge in the Northern District of California. The state moves under Rule 24(b)(2) of the Federal Rules of Civil Procedure for an order to intervene in this civil action for the purpose of clarifying and/or modifying the Stipulated Protective Order and various sealing orders as follows:

1 (a) Finding that the Stipulated Protective Order does not prohibit any party thereto
2 from producing documents and things, responding to interrogatories, or otherwise
3 responding to Civil Investigative Demands issued by the State of Washington fully and
4 without redaction, deletion or omission; and
5

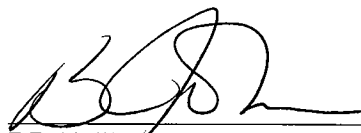
6 (b) Finding that the Court's orders to seal various materials filed of record do not
7 prohibit any party thereto from producing unredacted copies of those same materials
8 when they are sought via Civil Investigative Demand and subject to the full
9 confidentiality protections afforded by Wash. Rev. Code 19.86.110(7) and other
10 relevant law.

11 This motion is based on the attached Memorandum of Points and Authorities and
12 Declaration of Attorney Brady Johnson.
13

14 Dated: January 15, 2010

15 Respectfully submitted,

16 ROB MCKENNA
17 Attorney General of the State of Washington

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